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Interim Lead Counsel for Individual and Representative Plaintiffs and the Proposed Class

UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA SAN FRANCISCO DIVISION

RICHARD KADREY, et al.,

Individual and Representative Plaintiffs,

v.

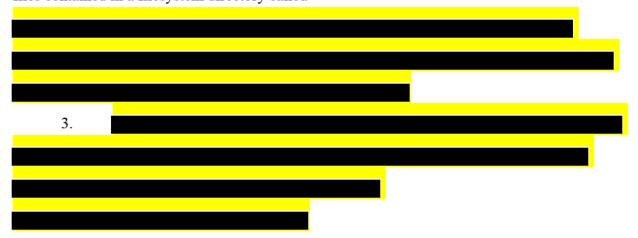
META PLATFORMS, INC.,

Defendant.

Case No. 3:23-cv-03417-VC

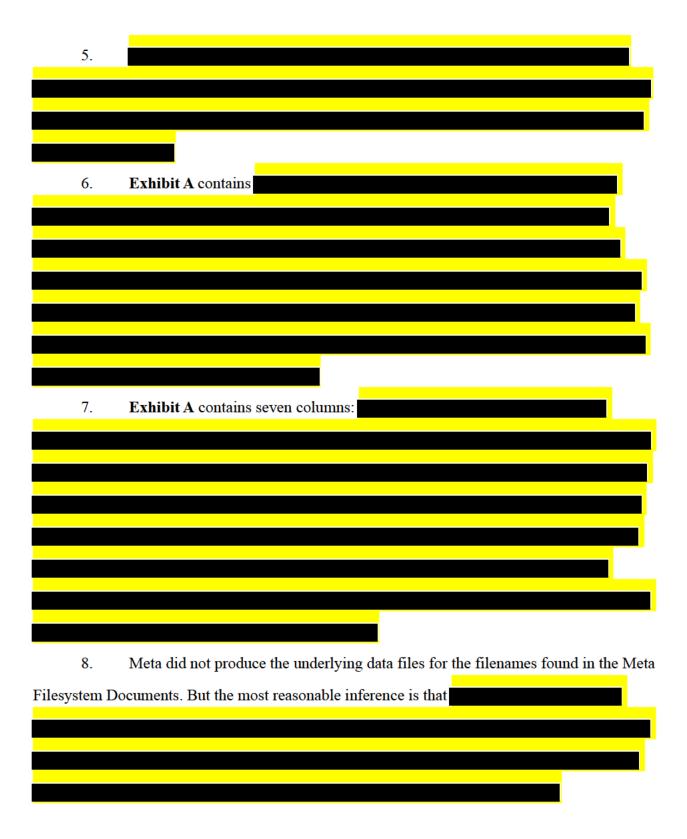
DECLARATION OF MATTHEW BUTTERICK IN SUPPORT OF PLAINTIFFS' SUMMARY JUDGMENT OPPOSITION AND REPLY

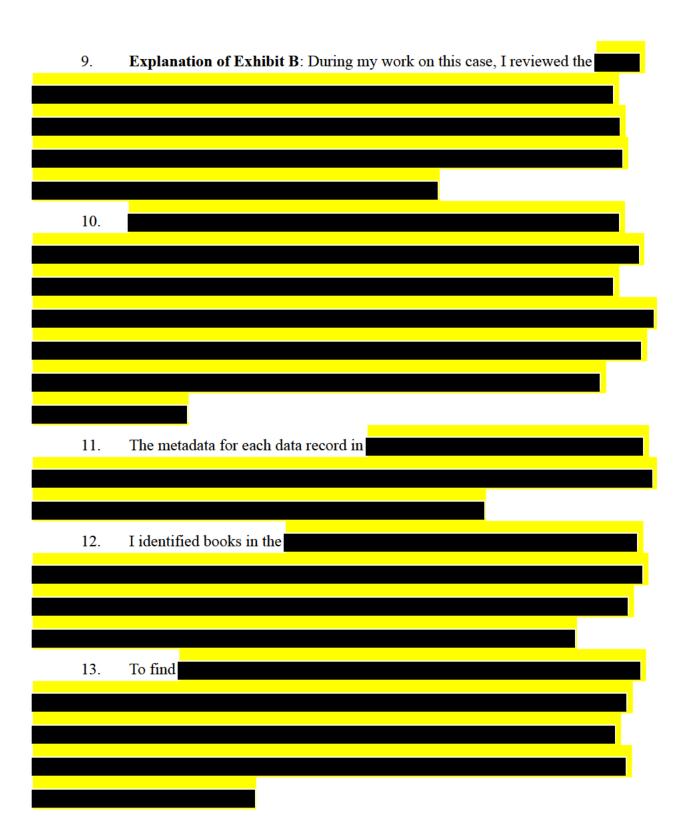
- I, Matthew Butterick, declare:
- 1. I am an attorney licensed to practice in California. I am co-counsel for Plaintiffs Christopher Golden, Richard Kadrey, and Sarah Silverman in this action. I have personal knowledge of the matters stated below. I can competently testify about them. I make this declaration under 28 U.S.C. § 1746 regarding exhibits I have prepared under Federal Rule of Evidence 1006 in support of Plaintiffs' Summary Judgment Opposition and Reply.
- 2. Description of Exhibit A: On or around March 26, 2025, Meta produced documents with Bates labels Meta_Kadrey_00237772 through Meta_Kadrey_00237779. Below, I call these the Meta Filesystem Documents. These documents appear to comprise a listing of files contained in a filesystem directory called



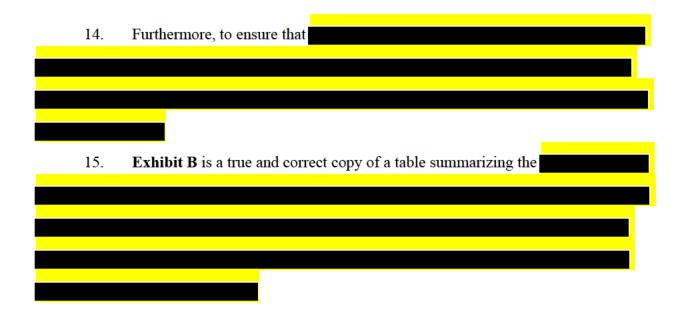
4. I have personally visited the shadow library known as Library Genesis (aka "LibGen") at the URL 'https://libgen.is'. Each pirated book file hosted on LibGen is associated with a unique 32-character hexadecimal string called an *MD5 hash*. For instance, my book *Typography for Lawyers* appears on LibGen and is associated with the MD5 hash "A288E549C5A3C9B6254745151CFD1E8A". Furthermore, the main LibGen URL for my book incorporates this MD5 hash:

https://libgen.is/book/index.php?md5=A288E549C5A3C9B6254745151CFD1E8A





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I declare under penalty of perjury that the foregoing is true and correct. Executed on April 7, 2025 in Los Angeles, California.

By: /s/ Matthew Butterick
Matthew Butterick